

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to:

Cox Automotive, Inc., et al. v. CDK Global, LLC, Hon. Amy J. St. Eve
Case No. 1:18-cv-1058 (N.D. Ill.)

**COX AUTOMOTIVE, INC., ET AL'S MOTION TO SEAL THEIR OPPOSITION AND
ACCOMPANYING EXHIBITS TO CDK GLOBAL, LLC'S MOTION TO DISMISS**

Plaintiffs, Cox Automotive, Inc., Autotrader.Com, Inc., Dealer Dot Com, Inc., Dealertrack, Inc., HomeNet, Inc., Kelley Blue Book Co., Inc., vAuto, Inc., VinSolutions, Inc., and Xtime, Inc. (collectively, "Cox"), respectfully request leave to file under seal their Opposition and Accompanying Exhibits to Defendant CDK Global, LLC's ("CDK") Motion to Dismiss. The Opposition and Exhibits include information from documents that CDK has designated as "Highly Confidential," and so Cox must seek leave to file them under seal. Cox will also file a public, redacted version of the Opposition.

Cox files this motion without prejudice to its ability to file a motion challenging CDK's designations. The documents at issue consist of direct communications between CDK and Reynolds reflecting the unlawful agreements alleged in Cox's complaint, and internal CDK documents regarding the same. There is nothing Highly Confidential about such communications and documents, yet CDK has thus far refused to de-designate them. Should the parties be unable to resolve their disagreement, Cox reserves the right to move for relief from this Court.

Dated: April 16, 2018

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Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on April 16, 2018, I caused a true and correct copy of the foregoing **COX AUTOMOTIVE, INC., ET AL'S MOTION TO SEAL THEIR OPPOSITION AND ACCOMPANYING EXHIBITS TO CDK GLOBAL, LLC'S MOTION TO DISMISS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.



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